## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

RONALD KASSOVER, on behalf of the Ronald Kassover IRA and all others similarly situated,	)
Plaintiff,	) )
v.	)
SONUS NETWORKS, INC., HASSAN AHMED, PH.D. AND STEPHEN NILL,	) )
Defendants.	) )

## STIPULATION AS TO ACCEPTANCE OF SERVICE AND SCHEDULING

WHEREAS, on February 12, 2004, plaintiff Ronald Kassover filed Ronald Kassover, on Behalf of the Ronald Kassover IRA and All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., and Stephen Nill, Civil Action No. 04-10329, MLW (D. Mass.) (the "Kassover" Complaint"), a putative class action complaint alleging securities fraud under the Exchange Act; and

WHEREAS, Plaintiff intends to file a motion to consolidate the Kassover Complaint with all other existing similar actions and later-filed similar actions. 1 and pursuant to the Private Securities Litigation Reform Act of 1995 (the "Reform Act"), intends to move for the appointment of a Lead Plaintiff and approval of the retention of Lead Plaintiff's counsel;

<sup>&</sup>lt;sup>1</sup> A current list of these existing and later-filed similar actions is attached as Exhibit A hereto.

that:

THEREFORE IT IS HEREBY STIPULATED AND AGREED by the parties

- 1. Service of the Kassover Complaint is accepted by each of the undersigned defendants, as of the date hereof or the date of personal service upon the defendants whichever is earlier;
- 2. Defendants need not respond to the Kassover Complaint, but shall respond to an Amended Consolidated Complaint no later than 45 days after such Amended Consolidated Complaint is served upon Defendants by the Lead Plaintiff, to be appointed by the Court in order to consolidate the Kassover Complaint with all other existing similar actions and later-filed similar actions in accordance with Section 21D(a)(3) of the Securities Exchange Act of 1934. In the event that the Motion to Consolidate is denied, Defendants shall respond to the Kassover Complaint no later than 45 days after such denial;
- 3. In the event that any deadline herein falls on a weekend or holiday, that deadline shall be extended to following business day; and

4. After appointment of a Lead Plaintiff pursuant to the Reform Act, service on lead counsel for such plaintiff shall satisfy Defendants' service obligations.

> RONALD KASSOVER, On Behalf of the Ronald Kassover IRA and All Others Similarly Situated,

By his attorneys,

Nancy Freeman Gans, (BBO# 184540)

Moulton & Gans, P.C. 33 Broad Street, Suite 1100 Boston, MA 02109 617-369-7979

Milberg Weiss Bershad Hynes & Lerach LLP

Steven G. Schulman Richard H. Weiss Peter E. Seidman Douglas J. Hoffman Andrei V. Rado One Pennsylvania Plaza – 49<sup>th</sup> Floor New York, NY 10119

SONUS NETWORKS, INC.

By their attorneys,

Jume W. Pen Jeffrey B. Rudman (BBO# 433380)

ames W. Prendergast (BBO# 553073)

Daniel W. Halston (BBO# 548692)

Hale and Dorr LLP

60 State Street

Boston, MA 02109

(617) 526-6000

- whent French (JWF)

## HASSAN AHMED, PH.D.

By his attorneys,

Robert S. Frank Jr. (BBO# 177240) John R. Baraniak Jr. (BBO# 552259)

**Choate Hall & Stewart Exchange Place Building** 53 State Street Boston, MA 02109-2891 (617) 617-248-5000

STEPHEN J. NILL

By his attorneys,

Thomas J. Dougherty (BBO# 132300) Matthew J. Matule (BBO# 632075)

Skadden, Arps, Slate, Meagher & Flom LLP

Mushew Mululo (JWF

One Beacon Street Boston, MA 02108-3194

(617) 573-4800

Dated: March 18, 2004

I hereby certify that a true copy of the above decument was sorved upon the attorney of reco

by/mail lby hand) on .

## **EXHIBIT A**

Document 5

- 1. Deborah Chin, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10294, DPW (D. Mass.)
- 2. Richard Curtis, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., and Stephen Nill, C.A. No. 04-10314, MLW (D. Mass.)
- 3. Samantha Den, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan H. Ahmed, Stephen J. Nill, C.A. No. 04-10310, DPW (D. Mass.)
- 4. Peter Kaltman, On Behalf of Himself and All Others Similarly Situated v. Sonus Networks, Inc., Ruben Gruber, Hassan Ahmed and Stephen Nill, C.A. No. 04-10309, DPW (D. Mass.)
- 5. Information Dynamics, LLC, On Behalf of Itself and All Others Similarly Situated v. Sonus Networks, Inc., Paul R. Jones, Edward N. Harris, J. Michael O'Hara, Hassan M. Ahmed and Stephen J. Nill, CA. No. 04-10308, DPW (D. Mass.)
- 6. Michelle Trebitsch, On Behalf Of Herself and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10307, DPW (D. Mass.)
- 7. Steve L. Baker, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10332, DPW (D. Mass.)
- 8. Haiming Hu, Individually and On Behalf Of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10346, DPW (D. Mass.)
- 9. Samuel Ho, Individually and On Behalf Of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10363, DPW (D. Mass.)
- 10. Ronald Kassover, On Behalf of The Ronald Kassover IRA and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10329, DPW (D. Mass.)
- 11. Michael Kaffee, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10345, DPW (D. Mass.)

- Wheaton Electrical Services Retirement 401K Profit Sharing Plan, On Behalf of Itself 12. and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10383, DPW (D. Mass.)
- Charles Starbuck, Individually and On Behalf of All Others Similarly Situated v. Sonus 13. Networks, Inc., Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10362, DPW (D. Mass.)
- 14. Robert Conte and Mark Respler, Themselves and On Behalf of All Others Similarly Situated v. Sonus, Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10382, DPW (D. Mass.)
- 15. Jeffrey C. Rodrigues, Individually and on Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10364, DPW (D. Mass.)
- 16. Brian Clark, Individually and on Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Paul R. Jones, J. Michael O'Hara, Hassan M. Ahmed and Stephen J. Nill, C.A. No. 04-10454, DPW (D. Mass.)